

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

UMG RECORDINGS, INC., *et al.*,

Plaintiffs,

v.

KURBANOV, *et al.*,

Defendants.

Case No. 1:18-cv-00957-CMH-TCB

PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF DOCUMENTS

Pursuant to Federal Rule of Civil Procedure 37 and Local Civil Rule 37, Plaintiffs respectfully move to compel Defendant Tofig Kurbanov ("Defendant") to produce:

(1) documents Defendant initially agreed to produce but is now withholding, (2) documents Defendant claims do not exist but undoubtedly must exist, and (3) unredacted versions of documents Defendant produced with improper redactions. For the reasons discussed in the accompanying memorandum in support, the Court should grant the motion.

LOCAL RULE 37(E) CONFERRAL STATEMENT

Counsel for Plaintiffs and Defendant exchanged emails concerning issues with Defendant's discovery responses and document production on May 13 and 17, 2021. The parties' respective counsel then met and conferred by telephone and video on May 19, 2021. Despite their good faith efforts, the parties were unable to resolve the discovery matters at issue.

Respectfully submitted,

Dated May 26, 2021

/s/ Scott A. Zebrak

Scott A. Zebrak (VSB No. 38729)

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CERTIFICATE OF SERVICE

I hereby certify that on May 26, 2021, I electronically filed the foregoing with the Clerk using the CM/ECF system, which will send the document and notification of such filing to counsel of record.

/s/ Scott A. Zebrak
Scott A. Zebrak